

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
vs.) Case No. 19-00372-01-GAF
)
NATHANIEL HIBDON,)
)
Defendant.)

MOTION TO EXTEND DEADLINE TO FILE PSR OBJECTIONS

COMES NOW the defendant, Nathaniel Hibdon, by and through his counsel, Todd M. Schultz, Assistant Federal Public Defender, and moves this Court to extend the deadline for filing Objections to the PSR until January 11, 2022.

SUGGESTIONS IN SUPPORT

1. On November 13, 2019, an indictment was filed in the Western District of Missouri charging Mr. Hibdon with violations of 18 U.S.C. § 2422(b) and 18 U.S.C. § 2423(a).
2. On November 20, 2019, the Office of the Federal Public Defender was appointed to represent Mr. Hibdon.
3. On September 2, 2021, defendant plead guilty to count 1 of the indictment.
4. Mr. Hibdon is currently in custody at CoreCivic – Leavenworth Detention Center. The circumstances at CoreCivic are making communication with clients in custody at that facility very difficult through the end of the year. Counsel needs adequate time to schedule a legal visit with Mr. Hibdon to review the PSR and to prepare the objections.
5. David Barnes, Assistant United States Attorney, has no objection to the extension request.

WHEREFORE, the defendant, Nathaniel Hibdon, respectfully requests this Court extend the deadline for filing Objections to the PSR until January 11, 2022.

Respectfully submitted,

/s/ Todd M. Schultz

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that on December 6, 2021, the foregoing motion was electronically filed and delivered to David Barnes, Asst. U.S. Attorney, 400 E. 9th, Kansas City, MO 64106.

/s/ Todd M. Schultz
Todd M. Schultz